

Exhibit A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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DR. DAVID SCHWARTZ,

Plaintiff,

-against-

THE CITY OF NEW YORK and LORELEI SALAS, in
her official capacity as Commissioner of the Department of
Consumer Affairs,

**STIPULATION OF
DISMISSAL WITH
PREJUDICE**

19-CV-643 (RJD)

Defendants.

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**NOW COME the parties and jointly stipulate to the dismissal of this action
with prejudice. In support thereof, the parties state as follows:**

- 1) Local Law 22 of 2018 (codified at New York City Administrative Code §§ 20-824 – 20-827), upon which this lawsuit was based, has been repealed.
- 2) The parties have reached a resolution in this case that resolves all claims, without admission of liability by any party.
- 3) The parties stipulate that this lawsuit should be dismissed with prejudice.
- 4) This is not a class action lawsuit, no receiver has been appointed, and no federal statute requiring a court order for dismissing a case governs this lawsuit.
- 5) Plaintiff has not previously dismissed any federal or state-court suit based on or including the same claims as those presented in this case.

6) Except as agreed to in their Stipulation of Settlement dated June 22, 2020 (the "Settlement Agreement"), each party is to bear its own costs, expenses, and attorneys' fees.

Dated: New York, New York
June __, 2020

ALLIANCE DEFENDING FREEDOM
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SO ORDERED:

Hon. Raymond J. Dearie, U.S.D.J.